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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)
)
Request for Amendment of the)
Commission's Rules To Enable)
Use of Line 21, Field 2 for)
Closed Captions and Data Services)

RM-8066

SEP 22 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission - MAIL STOP 1170

COMMENTS OF THE NATIONAL CAPTIONING INSTITUTE, INC.

Introduction and Summary

1. The National Captioning Institute, Inc. ("NCI") hereby submits its comments in response to the Electronic Industries Association's Consumer Electronics Group's ("EIA/CEG") July 7, 1992 petition for rulemaking on the above-noted matter ("Petition").

2. NCI is a nonprofit corporation created by Congress in 1979 and is the leading organization providing captioning services to the television industry and creating closed caption technology to ensure maximum television access for people with impaired hearing and those learning English as a second language. Since 1980, NCI's related achievements have included the development of numerous caption creation systems and six generations of closed caption decoding equipment, including a low cost LSI chip that meets all FCC requirements pertaining to Television Decoder Circuitry Act of 1990.

3. NCI supports EIA/CEG's position that all of field 2 of line 21 should be available to transmit captioning, captioning-related text, and other information. NCI also

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supports EIA/CEG's position that captions have priority to use line 21, field 2 over all other information and that line 21, field 2's data format (which NCI interprets to include coding), shall be identical to that currently authorized by the FCC under the present rule, which covers line 21, field 1, and the first half of field 2.

NCI Supports EIA/CEG's Position to Open Line 21, Field 2, but Urges the FCC To Adopt Rules that Will Ensure That Consumers' Reception of Captions and Caption-Related Text Services Is not Adversely Affected.

4. NCI believes the EIA/CEG petition addresses an unmet need to expand the closed captioned television services. The FCC's action on the EIA/CEG's proposed changes in applicable rules, however, should cover the issues noted below.

5. The EIA/CEG urges that line 21, field 2 be authorized to deliver additional channels of captioning and text, as well as an extended data service.^{1/} NCI supports this concept but notes that in an era of proliferating information services, it would be useful for regulators and service providers to agree what the terms "captions", "text", and "extended data service information" mean in order to understand the conditions under which they are to be provided. Accordingly, the applicable rules should include definitions for these terms. NCI suggests adoption of the definitions it uses: "captions" means a visual depiction of information simultaneously being provided on the audio portion of a television signal (note: "captioning" is the

^{1/} See the Petition at pp. 4-5.

process of creating "captions"); "text" means caption-related text; and "extended data service information" means information that is neither a caption nor text, as these terms are defined above.

6. EIA/CEG recommends that "caption information" continue to have priority and other data be carried on a space-available basis.^{2/} With the understanding that "caption information" means both captions, and text and "other data" means extended data service information, NCI supports this position.

7. EIA/CEG believes there is no public interest consideration which warrants any delay in opening up the use of all of field 2 of line 21 for captions and other data services using the data format that is identical to line 21, field 1.^{3/} NCI concurs in this position, as integrated circuits ("ICs") that have already been developed to meet the Television Decoder Circuitry Act of 1990 are capable of displaying line 21, field 2 data that is formatted and coded in the same way as line 21, field 1 data.^{4/} Accordingly, once the FCC line 21, field 2 rules become effective, line 21, field 2 captions and text may be immediately provided for and accessed by deaf consumers whose decoders and television receivers have the ICs mentioned above.

^{2/} Id. at p. 5.

^{3/} Id. at p. 9.

^{4/} This is so even though the Television Decoder Circuitry Act of 1990 and Section 15.119 of the FCC's Rules do not require receivers to be capable of displaying the second half of field 2.

Conclusion

8. NCI believes the EIA/CEG's petition to make line 21, field 2 open to captions, text, and extended data service information should be seriously and expeditiously considered with an eye toward developing regulations that will allow the implementation of line 21, field 2 services on or before July 1, 1993.

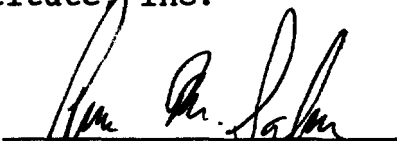
Of Counsel:

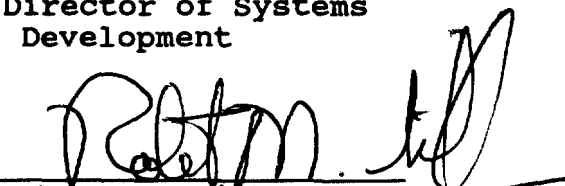

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Respectfully submitted,

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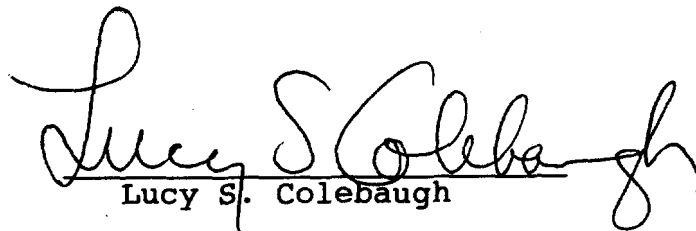
September 22, 1992

CERTIFICATE OF SERVICE

I, Lucy S. Colebaugh, do hereby certify that on this 22nd day of September, 1992, I have caused to be sent by first class United States mail, postage prepaid, copies of the foregoing Comments of the National Captioning Institute, Inc., to:

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